

Christopher J. Clark
Direct Dial: 212.906.1350
chris.clark@lw.com

53rd at Third
885 Third Avenue
New York, New York 10022-4834
Tel: +1.212.906.1200 Fax: +1.212.751.4864
www.lw.com

LATHAM & WATKINS LLP

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June 10, 2020

VIA ECF

Hon. Katherine Polk Failla
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *In re: Petróleos De Venezuela S.A. et al v. MUFG Union Bank, N.A. et al (1:19-cv-10023-KPF) Letter Requesting Oral Argument on Defendants' Motion to Exclude Expert Testimony*

Dear Judge Failla:

On behalf of Defendants and Counterclaim Plaintiffs MUFG Union Bank, N.A. and GLAS Americas LLC, we write pursuant to Rule 4(E) of Your Honor's Individual Rules & Practices to request that oral argument be held with respect to Defendants' motion to exclude the reports and testimony of Plaintiffs' expert David C. Hinman filed on June 10, 2020 in the above-captioned matter. Oral argument has already been scheduled in this action for August 12, 2020 (ECF No. 74), and we respectfully request that the hearing also include argument on this motion.

Respectfully submitted,



Christopher J. Clark
of LATHAM & WATKINS LLP

cc: All Counsel (via ECF)